

RE: Cantwell v. Gorcenski

Sent:  February 26, 2018 5:36 PM

From: **Sandra Freeman** sandra.c.freeman@protonmail.com

To: **Elmer Woodard** isuecrooks@comcast.net

CC: **Maira Meltzer-Cohen** Mo_At_Law@protonmail.com, pamstarsia@starsialaw.com
pamstarsia@starsialaw.com

Thank you for the clarification.

What do you propose we do regarding the development of a discovery plan and schedule as ordered by the Court?

Sandra C. Freeman, Esq.
5023 W. 120th Avenue, #280
Broomfield, Colorado 80020
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----- Original Message -----

On February 26, 2018 9:54 AM, Elmer Woodard <isuecrooks@comcast.net> wrote:

Yes I am going to move to amend.

From: Sandra Freeman [<mailto:sandra.c.freeman@protonmail.com>]
Sent: Monday, February 26, 2018 11:25 AM
To: Elmer Woodard <isuecrooks@comcast.net>
Cc: Pam Starsia <pamstarsia@protonmail.com>; Maira Meltzer-Cohen <Mo_At_Law@protonmail.com>
Subject: Re: Cantwell v. Gorcenski

Hi Elmer,

I just wanted to follow up on this because we need to provide the Court with a discovery plan tomorrow. Do you have time to talk this afternoon or would you prefer to plan via email?

Sandra C. Freeman, Esq.

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----- Original Message -----

On February 21, 2018 10:09 PM, Sandra Freeman <sandra.c.freeman@protonmail.com> wrote:

Hi Elmer,

Are you still planning to amend your complaint, or would you like to confer about a discovery plan so that we can inform the Court by next Tuesday?

Sandra C. Freeman, Esq.

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